



RE: Gasco - Permit Plans

Ben Hung to: Dana Bayuk

12/21/2012 03:07 PM

Ed Berschinski, John Edwards, Valerie Oster, Carl Stivers
, Tim Stone, Rob Ede, "Berry, Brady",
"mdcrystal@sevenson.com", "Hulstrom, Brett", "Nelson-Deal,
Sebrina", Sean Sheldrake, "Peterson, Lance",
Cc: GAINER Tom, "LARSEN Henning", Bob Wyatt, Patty Dost, Terry
Driscoll, Jeff Payson, "Burr, Myron", James Peale, "Tom
McCue (tmccue@maulfoster.com)", "Gladstone, Alan", "Folan,
Martin", "Burke, Joe"

4 attachments



DEQ 11-11-2012 Comments and NW Natural Responses_12-21-12.pdf



Final_ESPCP_Gasco_12-20-12.pdf



Final Dec 2012 Site Development Plan.pdf

Dana-

I've attached responses to DEQ comments on the Building Permit, Building Footprint Soil Sampling, Greenway Permit Exemption, and Site Development Plan.

Please review the responses on the Greenway Permit Exemption and Site Development Plan. Responses to comments on the first two documents were provided previously and satisfied DEQ's requests.

The response to #7 references the attached Erosion Control Plan, which has been submitted to the City.

The response to #8 references the attached Figure XX.

The response to #11 references the attached Site Development Plan, which has been finalized based on DEQ's comments.

Please confirm whether these responses and documents satisfy DEQ's requests.

Thanks,

Ben

-----Original Message-----

From: BAYUK Dana [mailto:BAYUK.Dana@deq.state.or.us]

Sent: Friday, November 30, 2012 12:32 PM

To: Ben Hung

Cc: Ed Berschinski; John Edwards; Valerie Oster; Carl Stivers; Tim Stone; Rob Ede; 'Berry, Brady'; 'mdcrystal@sevenson.com'; 'Jessica Stark'; 'Hulstrom, Brett'; 'Nelson-Deal, Sebrina'; 'Sean Sheldrake'; 'Peterson, Lance'; GAINER Tom; GRUNOW Greg; LARSEN Henning; Bob Wyatt; Patty Dost

Subject: RE: Gasco - Permit Plans

Hello Ben.

I've reviewed the e-mail and attachment you submitted yesterday afternoon that responds to DEQ's requests for information and our comments related to the

"Building Permit and Building Footprint Soil Sampling" section of my e-mail sent November 26, 2012 (see below).

As we discussed over the telephone this morning, the only information item not included in your e-mail was the "minimum available working distance north of the treatment building," which you provided during the call (i.e., 34-feet).

Based on the information provided in your e-mail and our discussion this morning, DEQ acknowledges NW Natural:

- Provided the information items we requested; and
- Satisfied our comments by providing written confirmation that: 1) the Soil Management Plan will be revised as indicated in our 11/26 e-mail; and 2) impacted material at and around Boring TB-2 will be over excavated and removed during building site preparation.

Regarding the Soil Management Plan, I understand from our phone call that NW Natural anticipates submitting the revised version of the document to the City of Portland (City) and DEQ later today.

Based on the information summarized above, this e-mail informs NW Natural and the City that NW Natural has addressed all of DEQ's 11/26 requests for information and comments related to "Building Permit and Building Footprint Soil Sampling."

Please feel free to contact me with questions regarding this e-mail.

Mr. Dana Bayuk, Project Manager
Cleanup & Portland Harbor Section
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Please visit our website at <http://www.oregon.gov/DEQ/>

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-----Original Message-----

From: Ben Hung [mailto:bhung@anchorage.com]

Sent: Thursday, November 29, 2012 1:56 PM

To: BAYUK Dana

Cc: Ed Berschinski; John Edwards; Valerie Oster; Carl Stivers; Tim Stone; Rob Ede; 'Berry, Brady'; 'mdcrystal@sevenson.com'; 'Jessica Stark'; 'Hulstrom, Brett'; 'Nelson-Deal, Sebrina'; 'Sean Sheldrake'; 'Peterson, Lance'; GAINER Tom; GRUNOW Greg; LARSEN Henning; Bob Wyatt; Patty Dost
Subject: RE: Gasco - Permit Plans

Dana-

I've attached responses to your comments on the Building Permit and the Building Footprint Soil Sampling.

The initial deadline for providing these responses was the close of business yesterday. However, based on discussions we had late yesterday afternoon, you agreed with my request to provide the responses today.

During our discussion yesterday, you indicated that you did not expect DEQ to have any additional requests related to the Building Permit and Building Footprint Soil Sampling. You also indicated that once you received and approved NW Natural's responses on these items, you would inform the City that the information NW Natural has provided has satisfied DEQ's requests related to the building permit.

We will respond to DEQ's comments on the Greenway Permit Exemption, the Site Development Plan, and the Treatment System Notice to Construct soon.

Thanks,

Ben

-----Original Message-----

From: BAYUK Dana [mailto:BAYUK.Dana@deq.state.or.us]

Sent: Monday, November 26, 2012 3:13 PM

To: Ben Hung

Cc: Ed Berschinski; John Edwards; Valerie Oster; Carl Stivers; Tim Stone; Rob Ede; 'Berry, Brady'; 'mdcrystal@sevenson.com'; 'Jessica Stark'; 'Hulstrom, Brett'; 'Nelson-Deal, Sebrina'; 'Sean Sheldrake'; 'Peterson, Lance'; GAINER Tom; GRUNOW Greg; LARSEN Henning
Subject: RE: Gasco - Permit Plans

Hello Ben.

As indicated in my e-mail sent earlier this afternoon (see below), besides reviewing the documents and files associated with the building permit, the greenway permit exemption, and the site development plan, I provided the status of our review of the air quality "notice of intent to construct" (NC) for the treatment system.

For clarification, the Cleanup Program's approval of the NC is subject to the Air Quality Program's "Plans and Specifications and Construction Approval Conditions" listed below.

1. The construction of the project must be in conformance to the plans and specifications submitted by the applicant and approved by the Department of Environmental Quality (Department) in this review. No changes or deviations, which would significantly alter the quantity or character of emissions may be made without prior written approval from the Department.
2. The Department's approval of this construction project does not relieve the applicant of the obligation of obtaining mandatory permits as required by local, state, and/or other authority.
3. This construction approval does not guarantee the adequacy of the proposed construction project. Compliance with Department regulations and permit conditions remains the responsibility of the applicant.
4. The applicant must operate within the plant site emission limits and conditions of operation as set forth in its Air Contaminant Discharge Permit.
5. The applicant must operate and maintain all processes and emission control equipment at the highest practical efficiency and effectiveness to minimize emissions of air pollution.
6. All processes and emission control equipment must be properly operated to prevent emission events and creation of a nuisance condition off the plant

site. If a nuisance condition is verified by the Department, process modification and/or control equipment may be required.

Note that Item #4 does not apply as based on the information provided in the NC an Air Contaminant Discharge Permit is not required for the treatment system at this time.

Please feel to contact me with questions regarding this e-mail.

Mr. Dana Bayuk, Project Manager
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Oregon Department of Environmental Quality
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Please visit our website at <http://www.oregon.gov/DEQ/>

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From: BAYUK Dana
Sent: Monday, November 26, 2012 1:20 PM
To: 'Ben Hung'
Cc: Ed Berschinski; John Edwards; Valerie Oster; Carl Stivers; Tim Stone; Berry, Brady; 'mdcrystal@sevenson.com'; 'Hulstrom, Brett'; 'Nelson-Deal, Sebrina'; GAINER Tom; GRUNOW Greg; LARSEN Henning
Subject: RE: Gasco - Permit Plans

Hello Ben.

I appreciate your November 19, 2012 e-mail sending the link to the updated treatment system building drawings, including the descriptions of the revisions made to each drawing. DEQ reviewed documents and files associated with the treatment system building permit, including the results of soil sampling work completed in the treatment building/parking area footprint; the greenway permit exemption, and site development plan. DEQ previously approved soil sampling to support the treatment building construction planning, and along with the City of Portland (City), the former gas holder foundation and storage building demolition permit.

DEQ's comments on each package of documents and files are provided below. Please read each closely as DEQ's expectations are also communicated in each section.

BUILDING PERMIT AND BUILDING FOOTPRINT SOIL SAMPLING

Building Permit

DEQ reviewed documents and files related to the main treatment building permit. DEQ's review included the "Final Soil Management Plan" dated September 24, 2012 (received October 17, 2012 [Soil Management Plan]) and selected engineering design drawings submitted to the City. DEQ's comments are provided below.

- DEQ requests that NW Natural confirm the distance between the main treatment building, including utilities, and the effective northern limit of the available working area (i.e., the minimum available working space north of the building). NW Natural should confirm in writing that the minimum available

working space will accommodate all work related to constructing the interceptor trench and monitoring its performance.

- The Soil Management Plan included with the building permit package does not reflect the procedures being used to manage excavated material. NW Natural should incorporate the first two paragraphs and items 2 through 7 of Section 2.6 (Soil Management) from the "Amended Scope of Work for Natural Gas Line Exposure and Inspection Work on Siltronic Corporation Property, 7200 NW Front Avenue, Portland, Oregon" dated July 10, 2007. The second paragraph of this document should be revised to reference drop boxes and trucks. All changes to the soil management plan should be fully incorporated into the Site Development Plan.

- DEQ requests confirmation that all joints for the water pumping and conveyance components of the treatment building will be sealed, including but not limited to the "Standard Manhole," "Flow Control Manhole," and "Stormwater Sump Pump" vault.

Building Footprint Soil Sampling

DEQ reviewed the "Waste Disposal Characterization Results for Soil, Proposed Wastewater Treatment Plant Building Area, NW Natural Gasco Property, 7900 NW St. Helens Road, Portland, Oregon" technical memorandum dated November 13, 2012. The memorandum provides the results of push-probe drilling and soil sampling and analysis conducted at nine boring locations within, or in the immediate vicinity of the combined treatment building and parking area footprint. Based on our review DEQ concludes that:

- The sampling and analytical program supports the treatment building construction project by characterizing soil for purposes of handling and offsite management. The results of the soil sampling and analytical work indicate excavated material can be managed consistent with protocols currently in-place for non-hazardous soil contaminated by MGP constituents.

- The detected concentration of benzo(a)pyrene exceeds the hot spot value for an occupational worker at boring TB-2. Carbon pitch observed in fine-grained material between 0.5-3 feet below ground surface may explain the detection. DEQ requests the area surrounding Boring TB-2 be over excavated to remove this material during building site preparation.

DEQ requests that by the end of day Wednesday November 28th NW Natural provide the information indicated above, and confirm in writing that the Soil Management Plan will be revised and over excavation will occur at and around Boring TB-2 consistent with our comments.

Please note that I will discuss the status of building permit with Mr. Hulstrom when he returns to the office tomorrow, and will contact you after this conversation to inform you of the status of the treatment building permit and confirm that DEQ's information requests and comments will be addressed.

GREENWAY PERMIT EXEMPTION

DEQ reviewed the "#12-112904 PR NW Natural Gasco Site Greenway Exempt Review Consistency Determination Narrative" dated October 16, 2012 (received October 17, 2012 [Greenway Permit Exemption]) for information regarding NW Natural's work with City related to the greenway. The Greenway Permit Exemption includes information regarding utility trenches not previously provided to DEQ. During the site visit on Monday November 19th, I spoke with Tim Stone (Anchor) and requested typical utility trench cross-sections between extraction wells PW-1U,L and PW-10L that illustrate changes in the

configuration (types and numbers) of utilities in the trenches. DEQ understands from Mr. Stone that Figure 4 from the Greenway Permit Exemption represents the most complex configuration of utilities in a trench. DEQ requests the locations of each typical be described or shown on a figure.

In addition to the utility trench typicals identified above, DEQ requests design and material information for the "Product Recovery Containment" components shown on Figure 3 of the Greenway Permit Exemption, including piping. If NW Natural envisions these components being dependent on the quantities of DNAPL collected and removed, then the overall approach for modifying and/or upgrading the components should be described, including the material information for containers and piping for each upgrade.

DEQ requests typicals for utility trenches be provided for review before the trenching covered by the Greenway Permit Exemption is initiated. In the interest of facilitating the project schedule, typicals for trench work scheduled soonest can be provided separately for expedited DEQ review.

Information for the Product Recovery Containment components should be provided before NW Natural proceeds with installing any related equipment.

SITE DEVELOPMENT PLAN

The "NW Natural and Siltronic Source Control Treatment Plant Site Development Plan" dated October 2012 (received October 17, 2012) includes information in Section 4 regarding utility trenches not previously provided to DEQ. During the site visit on November 19th, in addition to requesting typical utility trench cross-sections along shoreline segments 1 and 2, DEQ requested typicals of the utility trenches from the NW Natural pre-treatment area to the main treatment building.

For clarification, DEQ is interested in typical utility trench cross-sections that illustrate design considerations, changes in trench dimensions, and/or the range in numbers and types of utilities contained within trenches. With this in mind, DEQ requests typicals of the utility trenches described in Section 4 of the Site Development Plan, including between extraction wells and each pre-treatment area, from the Siltronic pre-treatment area to the NW Natural area, and from the pre-treatment area(s) to the main treatment building. Besides utility trench cross-sections, DEQ requests additional design and material information be provided for the "common wet well" located at the NW Natural pre-treatment area.

DEQ requests the typical drawings referenced above be provided for review before the utility trenching referenced in the Site Development Plan is initiated.

As noted above, the Site Development Plan should incorporate changes made to the Soil Management Plan that are discussed in DEQ's comments to the Building Permit.

TREATMENT SYSTEM "NOTICE OF INTENT TO CONSTRUCT"

DEQ received a soft copy of NW Natural's "notice of intent to construct" (NC) for the treatment system by e-mail on November 9, 2012. Based on meetings and discussions with NW Natural, SLR, and the DEQ Air Quality Program, the Cleanup Program acknowledges receipt of the NC and finds the document acceptable for purposes of the project. DEQ approves the NC, however NW Natural should be advised that future sampling conducted during operations will be used to further evaluate treatment system emissions and the information provided in the NC.

Based on your e-mail and our telephone call on November 20th, I understand NW Natural considers the treatment building permit to be the highest priority at this time. I further understand from you that Anchor recently informed NW Natural issuance of the permit waits on DEQ. As I indicated during the November 20th call, because revised permit drawings were recently submitted to the City and Brett Hulstrom (the City's lead in reviewing and processing the building permit) was out of the office until tomorrow (11/27), DEQ understood the permit was still in process and would not be issued until sometime after Mr. Hulstrom's return.

For clarification, regarding the document and file reviews referenced in this e-mail, the overall review process would have been more timely had DEQ been provided the Site Development Plan before planning/permitting documents and files were submitted to the City. NW Natural indicated the Site Development Plan would be prepared in a letter dated May 25, 2012. DEQ did not receive the plan until October 17th (i.e., during the time the City was reviewing plans and permits). Most if not all of DEQ's requests for information and comments included in this e-mail could have been addressed before documents/drawings were submitted to the City. Furthermore, NW Natural did not provide a schedule for treatment system construction and/or City permitting items as DEQ requested during the September and October monthly meetings. The schedule would have provided useful information for identifying NW Natural's review priorities for DEQ's information and planning purposes.

Please feel free to contact me with questions regarding this e-mail.

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From: Ben Hung [mailto:bhung@anchoragea.com]
Sent: Monday, November 19, 2012 12:18 PM
To: BAYUK Dana
Cc: Carl Stivers; John Edwards; Ed Berschinski; 'mdcrystal@sevenson.com';
Berry, Brady; Valerie Oster; Tim Stone
Subject: FW: Gasco - Permit Plans

Dana-

You requested that we provide DEQ with all permitting submittals. See below for a link to the documents. This is the same link provided previously and the documents have been continuously available for your review.

To focus and expedite DEQ's final review I requested a summary list of documents that have been refined and brief descriptions of what has changed. Please see the email below from Brady Berry for this list. Sheet C3.0 has been updated with the locations of the pretreatment areas since it was last posted and it is attached.

DEQ approval of this permit is the very last remaining item required for the permit to be approved by the City. The approval documentation that is needed is an email to Brett Hulstrom that references the project generally, includes the permit number, and includes text that explicitly states that DEQ approves construction of the wastewater treatment plant. The permit number and documentation request are provided on the BES Source Control Checklist Response (also attached). Your approval is requested as soon as possible.

Otherwise, I understand that you were at the Gasco site today and discussed additional DEQ requests with Tim Stone. These additional requests included cross-sections of the HC&C control trenches, influent pipeline trenches, and effluent trench. We understand that these items pertain to the Greenway permit exemption and are not related to the Wastewater Treatment Plant building permit. As such, these items should not be pre-requisites to your approval of the building permit and may be addressed separately.

I will give you a call to discuss further.

Thanks,

Ben

From: Berry, Brady [mailto:Bberry@whpacific.com]
Sent: Monday, November 19, 2012 10:43 AM
To: Ben Hung
Subject: Gasco - Permit Plans

Ben,

I have updated all the current plans and the checksheets that have been submitted to the City of Portland. The following is a summary of the changes made since the original posted plans that DEQ may have reviewed on 10/1/12.

C1.0 Updated fencing after coordination with NW Natural; relocated transformer per PGE; revised parking to set up for outside chemical storage (deferred submittal)
C1.1 New drawing showing the construction fencing location per coordination with the team.
C2.0 Grades per revisions.
C3.0 Updated process piping routing per NW Natural/kickoff meeting coordination.
A1.0 Removed chemical storage from building and occupancy group.
F1.1 Removed chemical storage from building.
F1.2 Removed chemical storage from building.
P2.1 Removed process area connection of interior SS from office SS piping.

The link to the plans is as follows:

<ftp://ftp-guest:mogollon@ftp.whpacific.com>

Please give me a call if you have questions.

Brady Berry, PE (OR, WA)
Senior Project Manager

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